



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590  
MAR 07 2014

**CERTIFIED MAIL 7009 1680 0000 7663 6377**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Paul Wilson  
Facilities Manager  
PCC Airfoils, LLC  
1470 East 289<sup>th</sup> Street  
Wickliffe, Ohio 44092

Re: Notice of Violation  
Compliance Evaluation Inspection  
PCC Airfoils, LLC  
1781 Octavia Road  
Cleveland, Ohio 44112  
EPA ID No.: OHD004179511

Dear Mr. Wilson:

On December 10, 2013, a representative of the U.S. Environmental Protection Agency inspected PCC Airfoils, LLC ("PCC" or "Facility") in Cleveland, Ohio. The purpose of the inspection was to evaluate PCC's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq.*, relating to the generation, treatment, and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by PCC personnel, on a review of records, and on personal observations by the inspector while inspecting the Facility, EPA finds that PCC, among other things, is engaged in the management of hazardous waste without a hazardous waste permit, and is in violation of permit requirements of the Ohio Administrative Code (OAC) and of the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, the conditions of OAC 3745-52-34(A)-(C) [40 CFR § 262.34(a)-(c)] must be met. EPA finds that PCC was not in compliance with the following conditions for a hazardous waste storage permit exemption:

**PCC does not qualify for the hazardous waste permit exemption**

1. In order to avoid the need for a hazardous waste permit, a large quantity generator may store hazardous waste in a container for 90 days or less provided, among other things, the date upon which each period of hazardous waste accumulation begins is clearly marked and visible for inspection on each container. *See*, OAC 3745-52-34(A)(2) [40 CFR § 262.34(a)(2)]. The generator must also mark each container with the words "Hazardous Waste." *See*, OAC 3745-52-34(A)(3) [40 CFR § 262.34(a)(3)].



At the time of the inspection, the following containers were not marked with the start dates of accumulation or with the words "Hazardous Waste."

- One 55-gallon drum labeled as "Used Blue Die (sic) Only" in the SIL Room awaiting on-site reclamation;
- One 55-gallon drum of "Used HES" in the SIL Room that, according to Mr. Wilson, had been processed through the reclamation unit and was to be tested for quality assurance; and
- One 55-gallon drum of "Remet R-25," in the SIL Room, which was to be processed through the reclamation unit because it had been determined to be off-specification.
- Three 55-gallon drums of "Used Alcohol" in the loading dock of the Research and Development building were, according to Mr. Wilson, to be run through the reclamation unit in the SIL Room of the main building. These containers were marked with start dates of accumulation but were not labeled with the words "Hazardous Waste."

PCC, therefore, failed to comply with the above-mentioned storage container labeling and dating conditions for a permit exemption.

2. In order to avoid the need for a hazardous waste permit and complying with OAC 3745-52-34(A) [40 CFR § 262.34(a)], a large quantity generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. See, OAC 3745-52-34(C)(1) [40 CFR § 262.34(c)(1)].

At the time of the inspection, two 55-gallon drums were being used to accumulate used "HES For Reclaim" near the HES Dipping Area. The volume of these containers combined exceeded 55-gallons. Also at the time of the inspection, PCC was accumulating "Used Blue Die (sic) Only" in a 55-gallon drum inside a flammable-proof cabinet in the HES Dipping Area. This waste is generated in a separate room in the Finishing Area of the Melamine Dip Line. This container was, therefore, not at or near the point of generation. PCC, therefore, failed to comply with the above-mentioned satellite container management conditions for a permit exemption:

#### **PCC operated a hazardous waste facility without an operating permit**

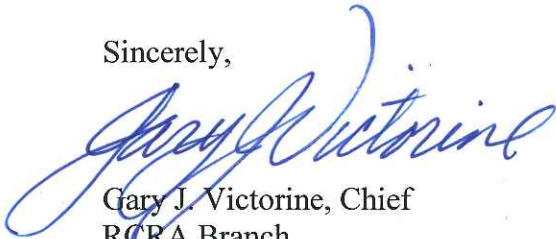
3. A generator of hazardous waste who accumulates hazardous waste on-site and who does not meet the conditions for a permit exemption of OAC 3745-52-34(A)-(C) [40 CFR § 262.34(a)-(c)], is an operator of a hazardous waste storage facility, and is required to obtain an Ohio hazardous waste storage permit. See, OAC 3745-50-45(C); 3745-50-41(A) and (D) [40 CFR §§ 270.1(c), 270.10(a) and (d)].

Upon failing to comply with the conditions for a permit exemption referenced in items 1 and 2, above, PCC became an operator of a hazardous waste storage facility, and was required to apply for and obtain a hazardous waste storage permit. PCC's failure to apply for and obtain a storage operating permit violated the requirements of OAC 3745-50-45(C); 3745-50-41(A) and (D) [40 CFR §§ 270.1(c); 270.10(a) and (d)].

At this time, EPA is not requiring PCC to apply for an Ohio hazardous waste storage permit so long as PCC immediately establishes compliance with the conditions for a permit exemption as outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation, and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Brenda Whitney, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney at (312) 353-4796.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Tom Roth - OEPA (Thomas.Roth@epa.ohio.gov)  
Bruce McCoy - OEPA (Bruce.McCoy@epa.ohio.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

**Date of Inspection:** December 10, 2013

**Facility Name:** PCC Airfoils, LLC – Ceramics Group

**Facility Address:** 1781 Octavia Road  
Cleveland, Ohio 44112

**Mailing Address:** 1470 East 289<sup>th</sup> Street  
Attention: Paul Wilson  
Wickliffe, Ohio 44092

**EPA RCRA ID Number:** OHD004179511

**Generator Status:** Large Quantity Generator

**Facility Contact:** Paul Wilson

**U.S. EPA Inspector:** Brenda Whitney - Environmental Engineer  
Resource Conservation and Recovery Act (RCRA) Branch  
Compliance Section 2

**Prepared By:** Brenda Whitney  
Brenda Whitney  
Environmental Engineer  
Compliance Section 2

**Date Completed:** 01 / 03 / 2014  
Month / Day / Year

**Accepted By:** Julie Morris  
Julie Morris  
Chief  
Compliance Section 2

**Date Accepted:** 11 / 3 / 14  
Month / Day / Year

### **Purpose of Inspection**

I conducted an unannounced Compliance Evaluation Inspection (CEI or “inspection”) of the PCC Airfoils, LLC – Ceramics Group (“PCC” or “Facility”) located in Cleveland, Ohio, on December 10, 2013. This CEI was an evaluation of PCC’s compliance with the RCRA hazardous waste regulations codified in the Ohio Administrative Code and the Code of Federal Regulations. PCC had notified the Ohio Environmental Protection Agency (OEPA) as a large quantity generator of hazardous waste generating more than 1,000 kilograms of hazardous waste per month. At the time of the inspection, representatives of the facility stated that PCC is a small quantity generator, or possibly conditionally exempt. Tom Roth, an Environmental Specialist with OEPA, was unable to accompany me on this CEI.

### **Participants**

<b>Paul Wilson</b> Facilities Manager	PCC – Wickliffe, Ohio
<b>Dan Wheeldon</b> Maintenance Manager Emergency Coordinator	PCC – Cleveland, Ohio
<b>Brenda Whitney</b> Environmental Engineer	EPA

### **Introduction**

I arrived at the Facility at 9:15 am (EST). I displayed my credentials to a security guard who granted me entrance to the facility. The guard contacted an employee who asked me to sign in a log book and pick up a visitor’s badge. He in turn asked Dan Wheeldon, the Maintenance manager to meet with me. Mr. Wheeldon contacted Mr. Wilson in Wickliffe, Ohio, who drove to the Facility to take over the inspection. As we waited approximately 30 minutes for Mr. Wilson to arrive, Mr. Wheeldon provided me with a general background of the facility processes and waste generation areas.

Mr. Wilson and I sat in a conference room where I delineated the purpose and logistics of the CEI. Mr. Wilson gave me a more in-depth description of the facility processes. I informed him that I would be taking waste-related photographs in the facility as necessary. I also provided Mr. Wilson with three informational handouts: *Onsite Pollution Prevention Assistance (OEPA brochure)*; *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*. We discussed EPA’s policy regarding confidential business information (CBI) and agreed to make a determination during the close-out discussion as to whether or not to claim CBI for any of the information gathered during the inspection. After this introduction, Mr. Wilson escorted me on a tour of the building.

## Site Description

The following information about PCC is based on the personal observations of the EPA inspector and on representations made during the CEI by the facility personnel identified above or within the text unless otherwise specified.

The PPC facility was originally built in the 1950s and was occupied by Sherwood Refractories and TRW. PCC Airfoils bought TRW in 1986. The same type of manufacturing has always taken place in this facility. Approximately 100 people who work three shifts six days a week are employed at this facility.

The products manufactured at PCC are ceramic molds that are to be cast into airfoils at a PCC Airfoils-owned foundry. These molds are bled out of the airfoil casts at the foundry using acid leaving the airfoil hollow. The Wickliffe, Ohio facility is similar to this one; however, the molds manufactured at Wickliffe are much larger.

PCC generates hundreds of varieties of ceramic molds or blocks, which are made out of fused silica and binders. The mix comes from one of the other PCC plants and contains naphthalene. The mix has to be cooled in order to prevent the evaporation of the naphthalene.

In the mold-making process, this material is injected into a press to create a solid core. This core will run through one of three processes: 1) kiln-firing; 2) dipping then firing; or 3) drier. In step 2, the cores are built up through a dip process. Cores are dipped in baths that contain ethyl alcohol. N-butyl acetate, also called "blue dye" is used in another segment of the process as part of a quality assurance measure. Spent liquids from these processes are reclaimed in a distillation unit on-site. When spent, these materials are hazardous for ignitability; however, they are not managed as hazardous waste prior to reclamation. The reclamation unit generates crystallized solids (distillation bottoms), which are managed as ignitable hazardous wastes. According to Mr. Wilson, the facility is nearly a conditionally exempt small quantity generator because the distillation bottoms as well as the wastes that are too dirty to be reclaimed are the only wastes they count toward their generator status. According to Mr. Wilson, the percentage of spent materials that are reclaimed is nearly 99%.

In the block-making process, the mix is poured into a mold that is fired in a kiln to burn off the volatiles. The resulting contoured block is used as a support in the airfoil-development process. A slurry containing ethyl alcohol is generated from this process only if a mistake is made and the process cannot be completed. This material sets and cannot be reclaimed and is managed as ignitable hazardous waste.

Used oil is generated through compressor maintenance. A profile for the used oil indicates a total halogen content below .1%. Forklifts and company vehicles are maintained by an outside vendor. Universal wastes generated at the site include batteries and used lamps. Mr. Wheeldon did not think that there were any mercury switches left in the building, and acknowledged that they would manage them as universal waste if there were to be any.

Other wastes generated at this facility include used rags, which are generated from cleaning equipment and are laundered through Cintas. A resin catalyst from a melamine dip process has been determined to be non-hazardous waste as has waste resin from the mold-forming process.

### **Site Tour**

**Mail Room:** A 2-gallon bucket of used batteries was in this room. The bucket was labeled as universal waste and marked with a date of 5/21/14. Mr. Wilson thought this date might be used as a reminder for when the one year accumulation time has expired.

**Maintenance:** A 55-gallon drum had been modified with a manual aerosol can-puncturing mechanism. The drum was labeled as "Hazardous Waste" and the mechanism was closed. A 55-gallon drum of used oil was also in this room. The drum was labeled as "Non-RCRA Regulated Waste," but also had the words "Used Oil" on it (See Appendix A: Photograph 1). I remarked to Mr. Wilson that used oil is a RCRA-regulated material. An evacuation route map was posted on a door in this room (See Appendix A: Photograph 2).

**SIL Room:** This room houses a chemical compounding line as well as the reclamation unit. One 55-gallon drum in the room was closed and was marked with the words "Used Blue die only" (See Appendix A: Photograph 3) This container of spent blue dye was to be reclaimed. A second 55-gallon drum labeled as "Used HES" was in the room. According to Mr. Wilson, this container held the distillation bottoms from the reclamation unit. He stated that the waste from the unit must be tested for weights as part of the quality assurance testing for the materials that have already been manufactured. If the waste fails the test, the batches of ceramic molds are to be discarded. Mr. Wilson also stated that this procedure is written in a company SOP. A third 55-gallon drum in the room held "Remet R-25," which, according to a hand-written note on the drum, was to be recycled because it did not meet specifications (See Appendix A: Photograph 4). A fourth drum held reclaimed alcohol as did one 5-gallon bucket. The SIL room was equipped with in-ground blind sumps. If there were any accumulation in the sumps, they would have to be sucked out and a hazardous waste determination would be made. Just outside of the SIL Room was a cardboard box of "Universal Waste" lamps with a start date of accumulation marked from 2-12-13.

**B-Cell Injection:** Injection presses were in this area. No hazardous waste was observed in this area.

**HES Dipping Area:** The dip process line was in this area. Two 55-gallon containers were collecting spent dip solution. Both were labeled as "HES For Reclaim" (See Appendix A: Photographs 5 and 6). Two other containers in the area were labeled as containing resin catalyst, which is non-hazardous. In a flammable-proof cabinet just outside of the HES Dipping Area, was a 55-gallon drum for spent blue dye. The drum was labeled as "Used Blue Die Only." This waste is generated in a separate room in the Finishing area of the melamine dip line. The blue dye is applied to the finished parts by quality assurance workers who check the product for imperfections.

The inspection continued to the Security Office, Tooling, Inspection, Drier, and parts storage areas. Hazardous waste was not observed in any of these areas. In the Security Office, however, were emergency postings including a list of emergency equipment listed according to facility-specific zone numbers, and a list of emergency contacts and the phone number for the fire department (911) (See Appendix A: Photographs 8 and 9).

The tour proceeded to the dismantled Research and Development (R&D) building and outdoor hazardous waste storage area.

**Hazardous Waste Storage Area:** The outdoor area was enclosed in a fence and housed dozens of empty drums. One 55-gallon drum on a pallet was marked as "Hazardous Waste" with the D001 waste number. The drum was dated from 10/24/13 (See Appendix A: Photograph 10).

**R&D:** In the loading dock of this building were three 55-gallon drums on a pallet (See Appendix A: Photographs 11-13). Each drum was marked as containing "Used Alcohol," and was dated from 10/3/13, 10/15/13, and 10/30/13, respectively. The containers were closed. Mr. Wilson stated that these containers were probably meant to be run through the reclamation unit. He did not explain why they were being stored in this otherwise unused building other than to protect the drums from freezing. The remainder of the building did appear to be unused with the exception of a small maintenance/machine shop.

### **Records and Emergency Preparedness Review**

**Contingency Plan:** The facility contingency plan was not available for review. It is kept at the Wickliffe facility. Mr. Wilson did not bring it to the inspection as he believes that the facility is operating as a small quantity generator.

**Emergency Preparedness:** The facility is equipped with a sprinkler system, which is checked for pressure on a weekly basis. Portable fire extinguishers are inspected monthly and undergo an inspection by the vendor on an annual basis. They also have a fire protection panel and a paging system to notify employees in the event of an emergency. Eye washes are provided. Employees managing hazardous waste carry radios.

**Personnel Training Requirements:** Training records were not available for review. Any records of this type are kept at the Wickliffe facility. According to Mr. Wilson, hazardous waste training has been provided to himself and Dan Wheeldon through their hazardous waste vendor, Chemtron. Everyone else in the plant receives emergency training through the PCC Human Resource department. Mr. Wilson has received his 40-hour training and is the only person who signs manifests at the facility.

**Manifests:** Mr. Wilson brought hazardous waste manifests with him to this facility for the inspection. These records are stored at Wickliffe. The manifests appeared to be complete and indicated that PCC was a large quantity generator of hazardous waste in at least 2011 and 2012. Land disposal restriction notices were available for review for each waste stream generated.

Waste Profiles: Mr. Wilson brought the waste profiles with him to this facility for the inspection. All wastes are characterized through generator knowledge.

Weekly Inspections of Container Storage: Weekly inspections were being conducted and recorded for the outdoor hazardous waste storage area.

### **Closing Conference**

The following items were discussed with PCC personnel at the close of the inspection:

- CBI – A determination was made that none of the information discussed or documents taken by Ms. Whitney during the inspection would be considered CBI.
- Hazardous waste requirements associated with reclamation of spent materials.
- Generator status.
- Satellite accumulation requirements.

### **Appendices**

Appendix A: Photograph Log

Appendix B: Checklists

Appendix C: Documents received from PCC during the inspection.

Appendix D: Emails between Ms. Whitney and representatives of PCC Airfoils, LLC, before and after acceptance of this inspection report.



---

# Appendix A

---

## Photograph Log

---

**Inspection Date:**

December 10, 2013

**Facility Name and ID Number:**

PCC Airfoils, LLC – Ceramics Group

EPA ID: OHD004179511

**Inspector and Photographer:**

Brenda Whitney

Compliance Section 2

RCRA Branch

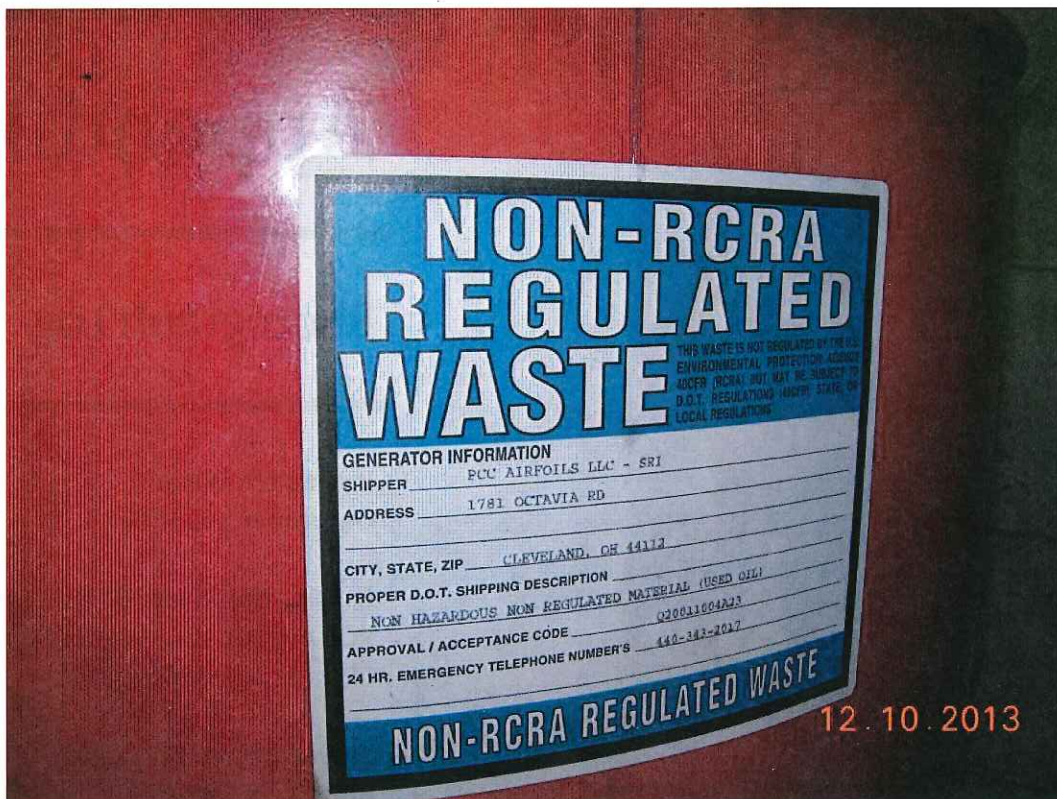
Land and Chemicals Division

**Camera Used:**

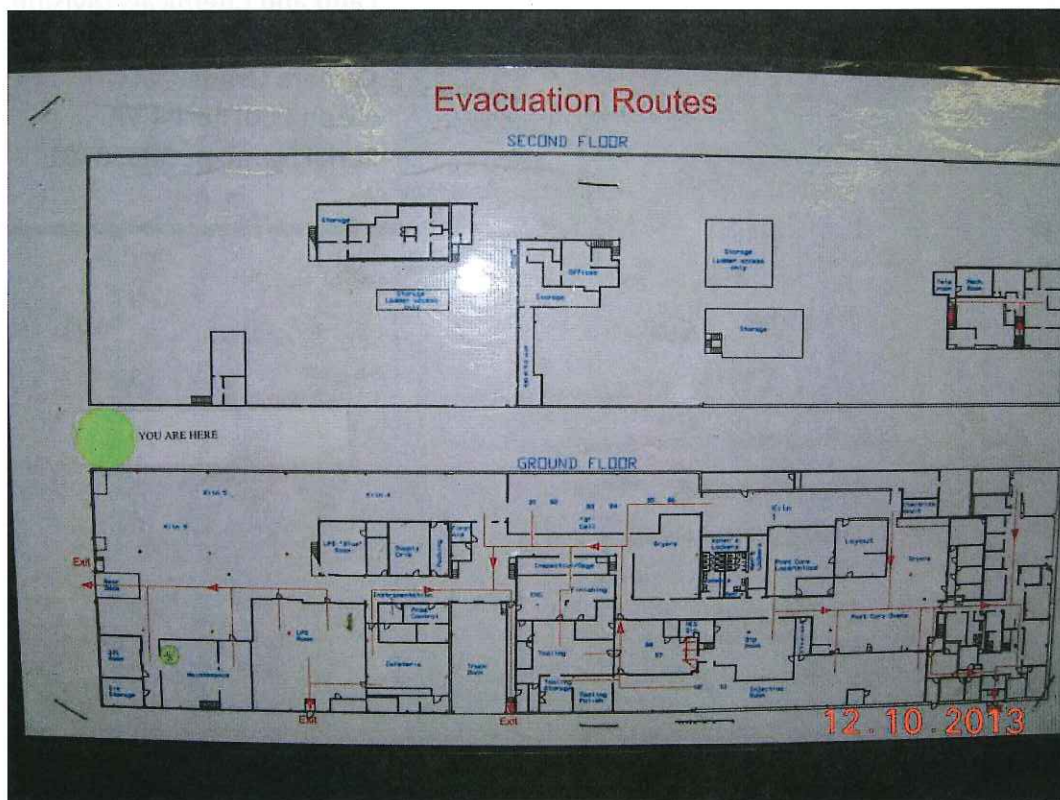
Nikon Cool Pix P4 VR

Serial Number: 30530701

---

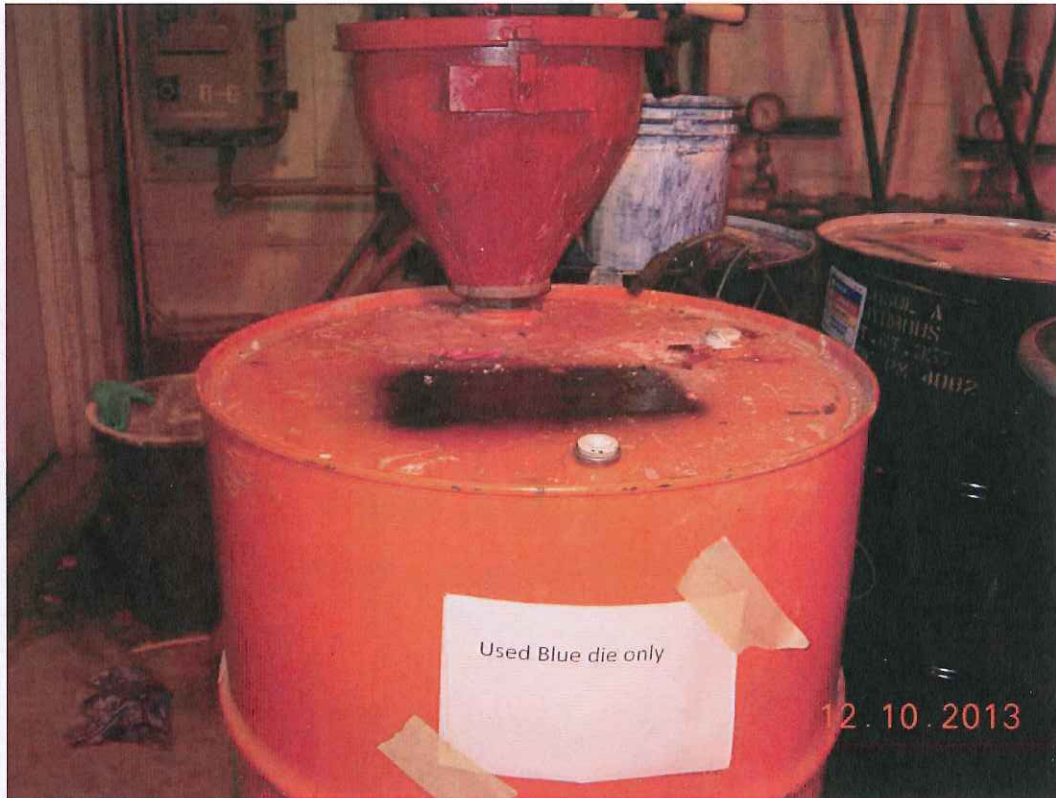


Photograph 1 – A 55-gallon drum of used oil in the Maintenance Room was labeled as “Non-RCRA Regulated Waste,” but also with the words “Used Oil.”

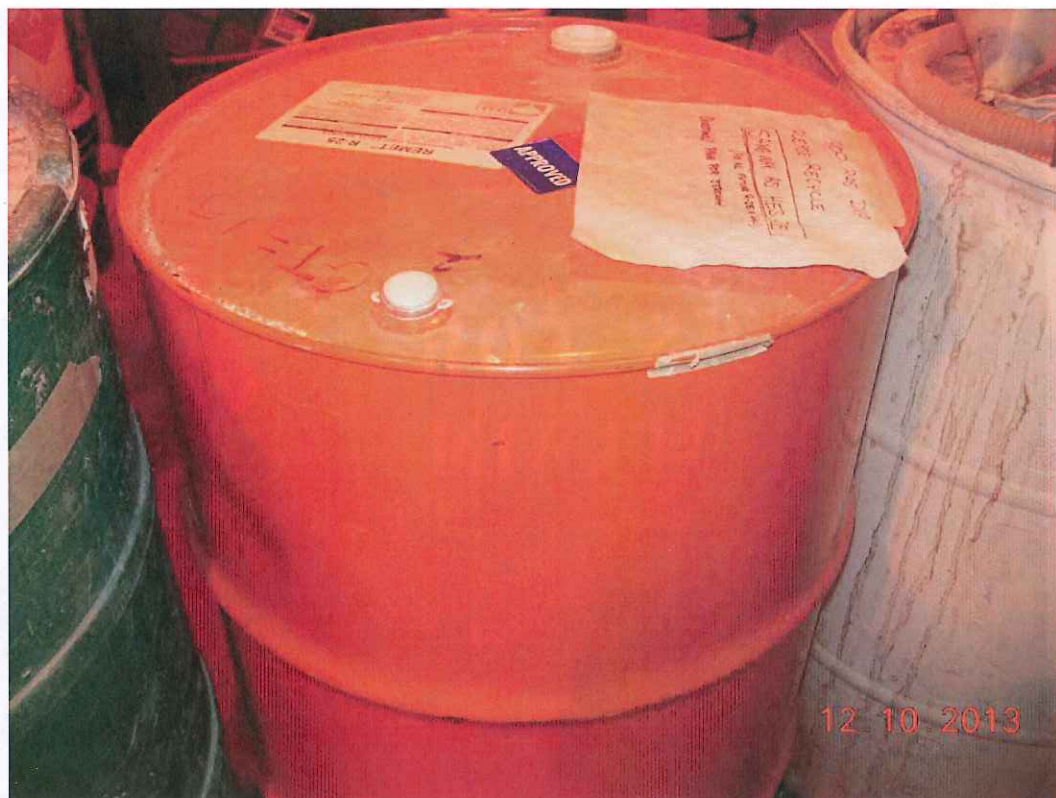


Photograph 2 – An evacuation map was posted in the Maintenance Room.

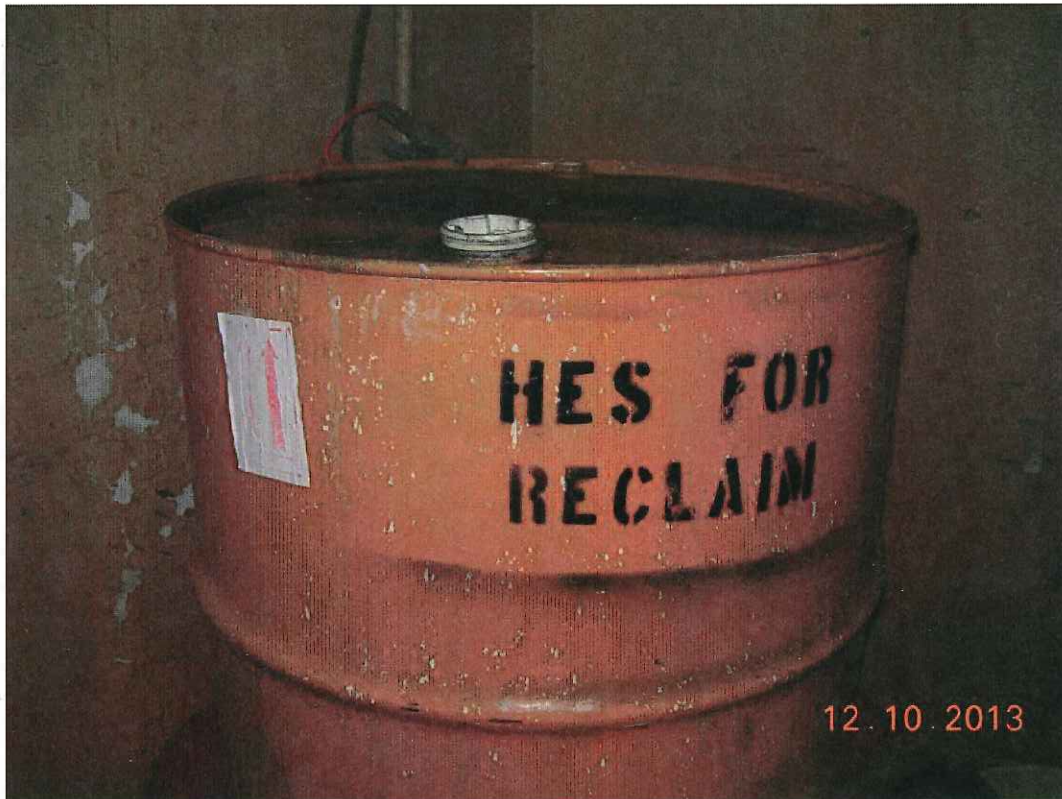




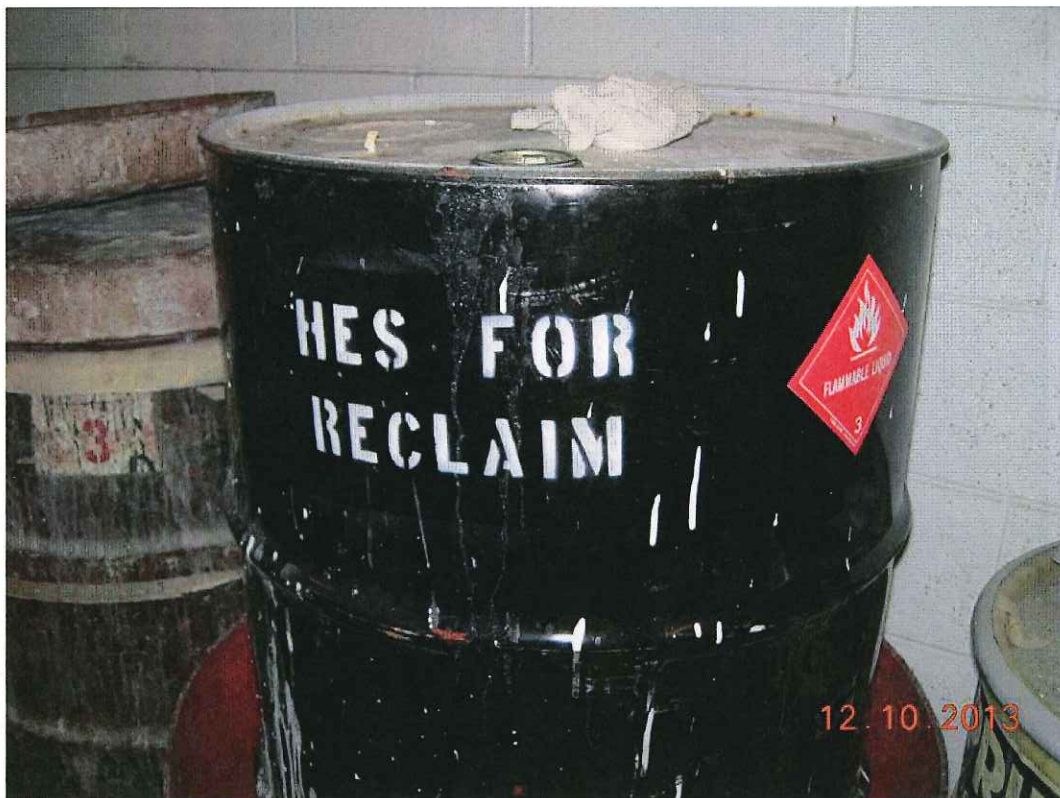
Photograph 3 – In the SIL Room, was a 55-gallon drum of “Used Blue die only.” The material in the drum was to be run through the reclamation unit in the room.



Photograph 4 – A second 55-gallon drum in the SIL room contained off-spec Remet R-25. This material was to be run through the reclamation unit.

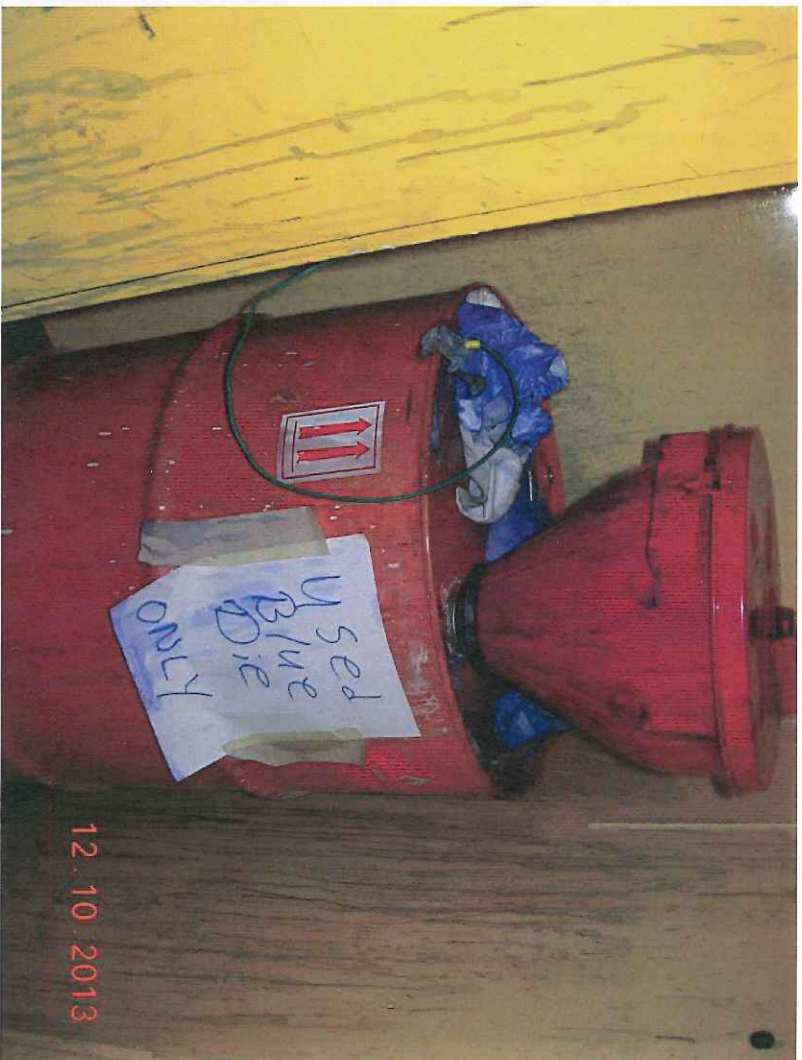


Photograph 5 – Outside of the HES Dipping Area were two 55-gallon drums collecting spent “HES For Reclaim.” The second drum is identified in Photograph 6.



Photograph 6 – See caption for Photograph 5.





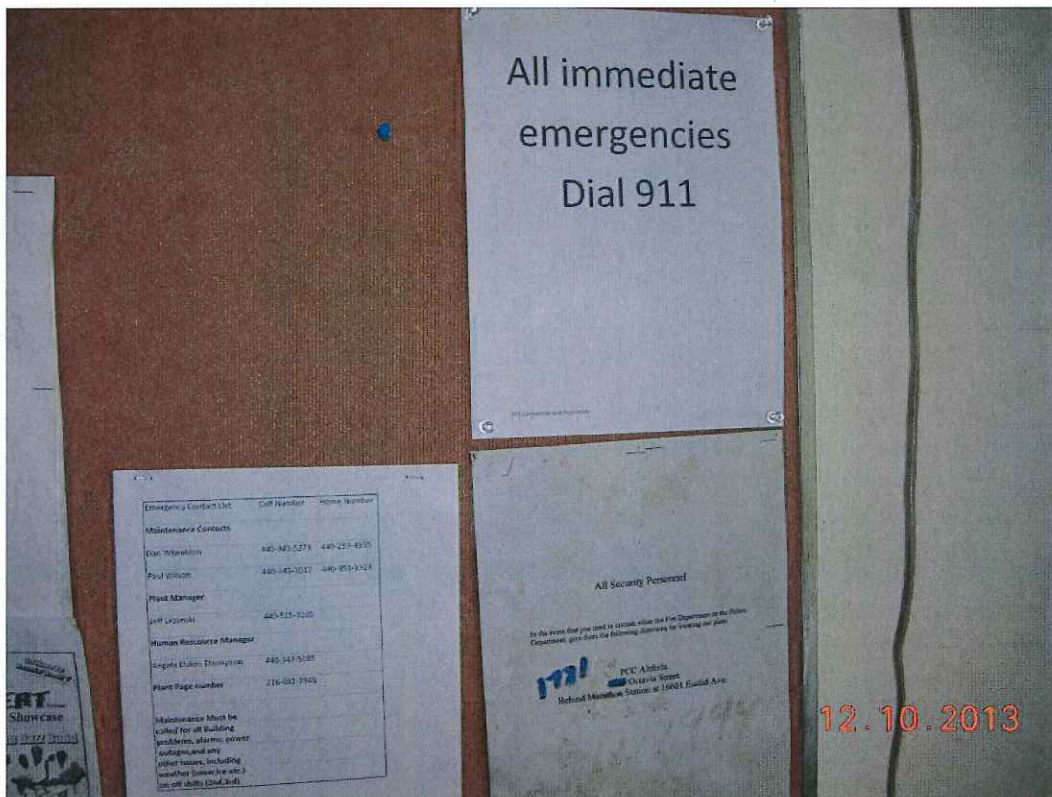
Photograph 7 – A 55-gallon drum of spent Blue Dye was kept in an area near the HES dipping line. This material was to be reclaimed on-site.

Zone Number	Zone Description
1	Smoke/Heat detector in Security office
2	Pull station, loading dock outside of security office
3	Tamper switch, anti freeze system for loading dock
4	Duct detector (blockroom) production area
5	Pull station Production area (mandoor blockroom)
6	Duct detector (smoke) by Sil room
7	Pull station north end exit by back overhead door
8	Tamper switch for anti freeze system back overhead door area
9	Pull station by B-cell area
10	Pull station in hall by Layout and first fire
11	Smoke/heat detector by panels in sand storage area south wall
12	Smoke/heat detector in electrical vault south end
13	Pull station by exterior door leading to the roof
14	Water flow switch on main fire water riser
15	Tamper switch on main fire water riser
16	Pull station south office entrance
17	Pull station S.W. office entrance
18	Pull station 2nd floor office area by restroom
19	Pull station 2nd floor office area by stairwell
20	Annex bldg (back bldg.) Aux. power supply
21	Smoke/ heat detector Annex bldg. (back bldg.) in loft by power supply
22	Pull station Annex bldg. (back bldg.) South east exit
23	Pull station Annex bldg. (back bldg.) Southwest exit
24	Water flow switch Annex bldg. (back bldg.) fire water riser
25	Tamper switch Annex bldg. (back bldg.) main fire water riser
26	Pull station Annex bldg. (back bldg.) West exit
27	Pull station Annex bldg. (back bldg.) North exit
28	Aux Panel 1 main bldg.

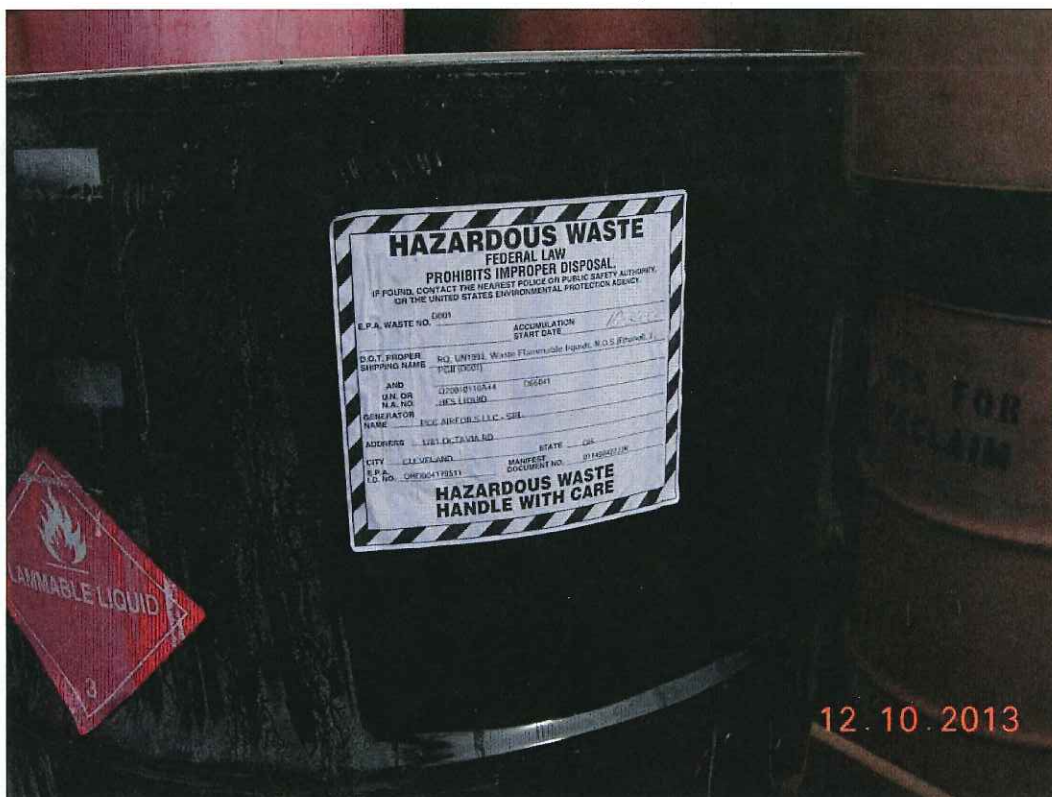
12.10.2013

ICC Confidential and Proprietary

Photograph 8 – This photograph is oriented on its left side. In the Security Office, this list of emergency equipment was posted.



Photograph 9 – In the Security Office, a list of emergency contacts as well as the phone number for the fire department were posted.



Photograph 10 – One 55-gallon drum was stored in the outdoor hazardous waste accumulation area. The drum was labeled as “Hazardous Waste” and marked with a start date of accumulation from 10/24/13.





Photograph 11 – Photographs 11 through 13 show three 55-gallon drums of “Used Alcohol” that were being stored in the loading dock of the closed R&D building.



Photograph 12 – See Caption for Photograph 11.



Photograph 13 – See Caption for Photograph 11.

---

# Appendix B

---

## Checklists

---

**Inspection Date:**

December 10, 2013

**Facility Name and ID Number:**

PCC Airfoils, LLC – Ceramics Group  
OHD004179511

**Inspector:**

Brenda Whitney  
Compliance Section 2  
RCRA Branch  
Land and Chemicals Division

---

c.	Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.				
11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]				
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]				
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.				
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40] <i>Not @ this Facility, but @ Wick, Ite</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.				
<b>PREPAREDNESS AND PREVENTION</b>				
17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]			
a.	Name and telephone number of emergency coordinator?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Location of fire and spill control equipment, and, if present, fire alarm(s)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Telephone number of local fire department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] <i>According to Representative</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:			
a.	Internal Alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

SQG/March 2009

Page 2 of 4

	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
23.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste <i>(unless the device is not required under OAC 3745-65-32)?</i> [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance <i>(unless not required under OAC 3745-65-32)?</i> [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>					
29.		Does the generator ensure that satellite accumulation area(s):			
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.					
<b>USE AND MANAGEMENT OF CONTAINERS</b>					
31.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

32.	Is the accumulation date on each container? [3745-52-34(D)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
33.	Are hazardous wastes stored in containers which are:			
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<b>NOTE:</b> Record location on process summary sheets and photograph the area.				
34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>NOTE:</b> OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.				
<b>PRE-TRANSPORT REQUIREMENTS</b>				
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>



# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

## PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

## WASTE MANAGEMENT AND LABELING/MARKING

### UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

### UNIVERSAL WASTE LAMPS

8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.**

10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
-----	--	---	-----------------------------	------------------------------

### ACCUMULATION TIME

11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

SQUWH-B&L/May 2012

Page 1 of 2

	handler to demonstrate) [3745-273-15(B)]	
NOTE: Accumulation is defined as date generated or date received from another handler.		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EMPLOYEE TRAINING</b>		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b>		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one</u> of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>EXPORTS</b>		
NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]		
NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.		

# USED OIL INSPECTION CHECKLIST

## GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

**NOTE:** 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: [https://www.comapps.ohio.gov/sfm/fire\\_apps/bust/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp).

### PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

### GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
----	--	------------------------------	-----------------------------	---

**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

### ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	<input checked="" type="checkbox"/> No		
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID Number]

Used Oil Checklist for Generators/August 2009

Page 1 of 2

c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).				
<b>GENERATOR TRANSPORTATION</b>				
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).				
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>				
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.				

---

# Appendix C

---

## Documents received during the Inspection from Mr. Wilson:

- Manifest dated 1/8/13 and associated LDR
- Manifest dated 4/9/13 and associated LDR'
- Manifest dated 5/30/13 and associated LDR

---

**Inspection Date:**  
December 10, 2013

**Facility Name and ID Number:**  
PCC Airfoils, LLC – Ceramics  
Group  
EPA ID: OHD004179511

---







Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>OHD004179511</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>440-343-2017</b>	4. Manifest Tracking Number <b>010985217 JJK</b>		
5. Generator's Name and Mailing Address <b>PCC AIRFOILS LLC - CERAMICS 1470 E 289TH ST ATTN: PAUL WILSON WICKLIFFE, OH 44092 Generator's Phone: 440-343-3571</b>			Generator's Site Address (if different than mailing address) <b>PCC AIRFOILS LLC - SRI 1781 OCTAVIA RD CLEVELAND, OH 44112</b>				
6. Transporter 1 Company Name <b>CHEMTRON CORPORATION</b>			U.S. EPA ID Number <b>OHD068080608</b>				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>CHEMTRON CORPORATION 35850 SCHNEIDER CT AVON, OH 44011 Facility's Phone: 440-937-6348</b>			U.S. EPA ID Number <b>OHD065060609</b>				
GENERATOR ↓	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. RQ, UN1993, Waste Flammable liquids, N.O.S. (Ethanol), 3, PGII (D001) <b>D 60696-1</b>	006	Dm	330	G	D001
		2. NON HAZARDOUS NON REGULATED MATERIAL (USED OIL) <b>- 2</b>	002	Dm	110	G	
	X	3. RQ, UN1325, Waste Flammable solids, organic, n.o.s. (ETHYL ALCOHOL), 4.1, PGII (D001) <b>- 3</b>	017	Dm	935	G	D001
		4.					
14. Special Handling Instructions and Additional Information <b>1.) Appl #: Q20010110A44 ; ERG # 128      3.) Appl #: 20110914-161 ; ERG # 133      170708      Document: D60696</b> <b>2.) Appl #: Q20011004A23 ; ERG #</b>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name <b>Paul Wilson</b>		Signature <b>Paul Wilson</b>		Month Day Year <b>1/18/13</b>			
INTL ↓	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:				
TRANSPORTER ↓	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name <b>James Schneider</b>		Signature <b>James Schneider</b>		Month Day Year <b>1/18/13</b>		
DESIGNATED FACILITY ↓	Transporter 2 Printed/Typed Name		Signature		Month Day Year		
	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator)      U.S. EPA ID Number						
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)      Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <b>H141</b>		2. <b>H141</b>		3. <b>H141</b>		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name <b>JOSEPH T. KISKA</b>		Signature <b>Joseph T. Kiska</b>		Month Day Year <b>01/09/13</b>			



LAND DISPOSAL RESTRICTION NOTIFICATION & CERTIFICATION FORM (LDR)

CHEMTRON CORPORATION

35850 SCHNEIDER COURT, AVON, OH 44011

PHONE (440) 937-6348 FAX (440) 937-6845

PAGE 1 OF 1

GENERATOR NAME PCC AIRFOILS - CERAMICS  
GROUP

GENERATOR EPA# OHD987045408

MANIFEST DOCUMENT NO. 010985217JJK

DATE

SIGNATURE X

PRINT

\*\*\*PLEASE REFER TO INSTRUCTIONS FOR IMPORTANT INFORMATION AND CODES FOR UHC'S AND CERTIFICATION\*\*\*

COMPLETE ALL APPLICABLE ITEMS.

LINE NO.	APPROVAL NO.	EPA WASTE NO.(S)	NWW	WW	SUBCAT.	UHC'S	CERT
9B1	Q20010110A44	D001	X		S1	NONE	A
9B3	20110914-161	D001	X		S1	NONE	A

FOR F001-F005 SPENT SOLVENTS, LIST THE NUMBER NEXT TO THE CONSTITUENT THAT IS PRESENT.

LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT
	ACETONE		CYCLOHEXANONE		NITROBENZENE
	BENZENE		O-DICHLOROBENZENE		PYRIDINE
	N-BUTANOL		ETHYL ACETATE		TETRACHLOROETHYLENE
	CARBON DISULFIDE		ETHYL BENZENE		TOLUENE
	CARBON TETRACHLORIDE		ETHYL ETHER		1,1,1-TRICHLOROETHANE
	CHLOROBENZENE		ISOBUTANOL		1,1,2-TRICHLOROETHANE
	O-CRESOL		METHANOL		1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE
	M-CRESOL		METHYLENE CHLORIDE		TRICHLOROETHYLENE
	P-CRESOL		METHYL ETHYL KETONE		TRICHLOROMONOFUORO-METHANE
	CREOSOLS/CRESYLIC ACID		METHYL ISOBUTYL KETONE		XYLENES (MIXED)

UHC'S OR UNDERLYING HAZARDOUS CONSTITUENTS ARE REGULATED WITHIN THE UNIVERSAL TREATMENT STANDARDS. GENERATOR'S ARE REQUIRED TO IDENTIFY THE UNDERLYING CONSTITUENTS IN WASTE WITH THE FOLLOWING EPA WASTE NUMBERS: D001 (EXCEPT D001 WASTES WHICH CAN BE TREATED BY CMBST), D002, D012-D043. FOR MORE INFORMATION REFER TO 40 C.F.R. PART 268.





Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>OH0004179511</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>440-343-2017</b>	4. Manifest Tracking Number <b>010987614 JJK</b>		
5. Generator's Name and Mailing Address <b>PCC AIRFOILS LLC - CERAMICS 1470 E 289TH ST ATTN: PAUL WILSON WICKLIFFE, OH 44092 Generator's Phone: 440-343-3571</b>		Generator's Site Address (if different than mailing address) <b>PCC AIRFOILS LLC - SRI 1781 OCTAVIA RD CLEVELAND, OH 44112</b>					
6. Transporter 1 Company Name <b>CHEMTRON CORPORATION</b>		U.S. EPA ID Number <b>OH0068060609</b>					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address <b>CHEMTRON CORPORATION 35850 SCHNEIDER CT AVON, OH 44011 Facility's Phone: 440-937-6348</b>		U.S. EPA ID Number <b>OH0068060609</b>					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
X	1. <b>RQ, UN1903, Waste Flammable liquids, N.O.S. (Ethanol), 3 PGII (D001)</b> <b>063955-1</b>	<b>004</b>	<b>DM</b>	<b>220</b>	<b>G</b>	<b>D001</b>	
X	2. <b>UN2809, Mercury, 8, PGIII (UNIVERSAL WASTE LAMPS) (Fluorescent bulbs)</b> <b>- 2</b>	<b>002</b>	<b>CF</b>	<b>40</b>	<b>P</b>		
	3. <b>Non Hazardous Non Regulated (resin catalyst rinse bath)</b> <b>- 3</b>	<b>006</b> <b>004</b>	<b>DM</b>	<b>330</b> <b>220</b>	<b>KG</b>		
X	4. <b>RQ, UN1325, Waste Flammable solids, organic, n.o.s. (ETHYL ALCOHOL), 4.1, PGII (D001)</b> <b>- 4</b>	<b>011</b>	<b>DM</b>	<b>605</b>	<b>G</b>	<b>D001</b>	
14. Special Handling Instructions and Additional Information  1.) Appl #: Q20010110A44 ; ERG # 128 2.) Appl #: Q20010307A22 ; ERG # 172 3.) Appl #: 20080522-222 ; ERG # 4.) Appl #: 20110914-151 ; ERG # 133 Document: D63955 173398							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name <b>Paul Wilson</b>		Signature <b>Paul Wilson</b>			Month Day Year <b>14 9 13</b>		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:					
Transporter signature (for exports only):							
17. Transporter Acknowledgment of Receipt of Materials		Signature <b>J Schaefer</b>			Month Day Year <b>14 9 13</b>		
Transporter 1 Printed/Typed Name <b>J Schaefer</b>							
Transporter 2 Printed/Typed Name							
18. Discrepancy		<input type="checkbox"/> Quantity <b>830</b> <b>915</b> <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18a. Discrepancy Indication Space		Manifest Reference Number: U.S. EPA ID Number					
18b. Alternate Facility (or Generator)		U.S. EPA ID Number					
Facility's Phone:		Month Day Year					
18c. Signature of Alternate Facility (or Generator)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.	<b>H141</b>	2.	<b>H141</b>	3.	<b>H141</b>	4.	<b>H141</b>
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <b>JOSEPH J KISKA</b>		Signature <b>JOSEPH J KISKA</b>			Month Day Year <b>10 4 10 9 13</b>		



# LAND DISPOSAL RESTRICTION NOTIFICATION & CERTIFICATION FORM (LDR)

CHEMTRON CORPORATION  
35850 SCHNEIDER COURT, AVON, OH 44011  
PHONE (440) 937-6348 FAX (440) 937-6845

PAGE 1 OF 1

GENERATOR NAME PCC AIRFOILS, LLC-SRI

GENERATOR EPA# OHD004179511

MANIFEST DOCUMENT-NO. 010987614JJK

DATE 4-9-13  
PRINT X Paul Wilson

SIGNATURE X *[Signature]*

\*\*\*PLEASE REFER TO INSTRUCTIONS FOR IMPORTANT INFORMATION AND CODES FOR UHC'S AND CERTIFICATION\*\*\*

COMPLETE ALL APPLICABLE ITEMS.

LINE NO.	APPROVAL NO.	EPA WASTE NO. (S)	NWW	WW	SUBCAT.	UHC'S	CERT
9B1	Q20010110A44	D001	X		S1	NONE	A
9B4	20110914-161	D001	X		S1	NONE	A

FOR F001-F005 SPENT SOLVENTS, LIST THE NUMBER NEXT TO THE CONSTITUENT THAT IS PRESENT.

LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT
	ACETONE		CYCLOHEXANONE		NITROBENZENE
	BENZENE		O-DICHLOROBENZENE		PYRIDINE
	N-BUTANOL		ETHYL ACETATE		TETRACHLOROETHYLENE
	CARBON DISULFIDE		ETHYL BENZENE		TOLUENE
	CARBON TETRACHLORIDE		ETHYL ETHER		1,1,1-TRICHLOROETHANE
	CHLOROBENZENE		ISOBUTANOL		1,1,2-TRICHLOROETHANE
	O-CRESOL		METHANOL		1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE
	M-CRESOL		METHYLENE CHLORIDE		TRICHLOROETHYLENE
	P-CRESOL		METHYL ETHYL KETONE		TRICHLOROMONOFUORO-METHANE
	CREOSOLS/CRYSYLIC ACID		METHYL ISOBUTYL KETONE		XYLENES (MIXED)

UHC'S OR UNDERLYING HAZARDOUS CONSTITUENTS ARE REGULATED WITHIN THE UNIVERSAL TREATMENT STANDARDS. GENERATOR'S ARE REQUIRED TO IDENTIFY THE UNDERLYING CONSTITUENTS IN WASTE WITH THE FOLLOWING EPA WASTE NUMBERS: D001 (EXCPT D001 WATES WHICH CAN BE TREATED BY CMBST), D002, D012-D043. FOR MORE INFORMATION REFER TO 40 C.F.R. PART 268.





se print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>OHD004179511</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>440-343-2017</b>	4. Manifest Tracking Number <b>011490422 JJK</b>			
5. Generator's Name and Mailing Address <b>PCC AIRFOILS LLC - CERAMICS 1470 E 289TH ST ATTN: PAUL WILSON WICKLIFFE, OH 44092 Generator's Phone: 440-343-3571</b>			Generator's Site Address (If different than mailing address) <b>PCC AIRFOILS LLC - SRI 1781 OCTAVIA RD CLEVELAND, OH 44112</b>					
6. Transporter 1 Company Name <b>CHEMTRON CORPORATION</b>				U.S. EPA ID Number <b>OHD066060608</b>				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>CHEMTRON CORPORATION 35850 SCHNEIDER CT AVON, OH 44011 Facility's Phone: 440-937-6348</b>				U.S. EPA ID Number <b>OHD066060608</b>				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
	X	1. RQ, UN1993, Waste Flammable liquids, N.O.S. (Ethanol), 3, PGI (D001) <b>066041-1</b>	001	OM	55	G	D001	
	X	2. RQ, UN1325, Waste Flammable solids, organic, n.o.s. (Ethyl Alcohol), 4.1, PGI (D001) <b>-2</b>	007	PM	385	G	D001	
		3.						
		4.						
14. Special Handling Instructions and Additional Information  1.) Appl #: Q20010110444 ; ERG #128 2.) Appl #: 20110914-151 ; ERG # 133 <div style="text-align: right; margin-top: 10px;"><b>175069</b> Document: <b>066041</b></div>								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name <b>Paul Wilson</b>		Signature <i>Paul Wilson</i>		Month <b>5</b>		Day <b>30</b>		
				Year <b>13</b>				
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Materials							
TRANSPORTER	Transporter 1 Printed/Typed Name <b>J Schneider</b>		Signature <i>J Schneider</i>		Month <b>5</b>		Day <b>30</b>	
					Year <b>13</b>			
		Transporter 2 Printed/Typed Name		Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	Manifest Reference Number:							
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number			
	Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. <b>H1141</b>		2. <b>H1241</b>		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name <b>JOSEPH J. KISKA</b>				Signature <i>Joseph J. Kiska</i>		Month <b>10</b>		
						Day <b>31</b>		
						Year <b>13</b>		



**LAND DISPOSAL RESTRICTION NOTIFICATION & CERTIFICATION FORM (LDR)**

**CHEMTRON CORPORATION**  
 35850 SCHNEIDER COURT, AVON, OH 44011  
 PHONE (440) 937-6348 FAX (440) 937-6845

PAGE 1 OF 1

GENERATOR NAME PCC AIRFOILS, LLC-SRI

GENERATOR EPA# OHD004179511

MANIFEST DOCUMENT NO. 011490422JJK

DATE 5/30/13

SIGNATURE *Paul Wilson*

PRINT X Paul Wilson

\*\*\*PLEASE REFER TO INSTRUCTIONS FOR IMPORTANT INFORMATION AND CODES FOR UHC'S AND CERTIFICATION\*\*\*

COMPLETE ALL APPLICABLE ITEMS.

LINE NO.	APPROVAL NO.	EPA WASTE NO.(S)	NWW	WW	SUBCAT.	UHC'S	CERT
9B1	Q20010110A44	D001	X		S1	NONE	A
9B2	20110914-161	D001	X		S1	NONE	A

**FOR F001-F005 SPENT SOLVENTS, LIST THE NUMBER NEXT TO THE CONSTITUENT THAT IS PRESENT.**

LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT
	ACETONE		CYCLOHEXANONE		NITROBENZENE
	BENZENE		O-DICHLOROBENZENE		PYRIDINE
	N-BUTANOL		ETHYL ACETATE		TETRACHLOROETHYLENE
	CARBON DISULFIDE		ETHYL BENZENE		TOLUENE
	CARBON TETRACHLORIDE		ETHYL ETHER		1,1,1-TRICHLOROETHANE
	CHLOROBENZENE		ISOBUTANOL		1,1,2-TRICHLOROETHANE
	O-CRESOL		METHANOL		1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE
	M-CRESOL		METHYLENE CHLORIDE		TRICHLOROETHYLENE
	P-CRESOL		METHYL ETHYL KETONE		TRICHLOROMONOFUORO-METHANE
	CREOSOLS/CRYSYLIC ACID		METHYL ISOBUTYL KETONE		XYLENES (MIXED)

UHC'S OR UNDERLYING HAZARDOUS CONSTITUENTS ARE REGULATED WITHIN THE UNIVERSAL TREATMENT STANDARDS. GENERATOR'S ARE REQUIRED TO IDENTIFY THE UNDERLYING CONSTITUENTS IN WASTE WITH THE FOLLOWING EPA WASTE NUMBERS: D001 (EXCPT D001 WATES WHICH CAN BE TREATED BY CMBST), D002, D012-D043. FOR MORE INFORMATION REFER TO 40 C.F.R. PART 268.



---

# Appendix D

---

Email exchanges  
between Brenda  
Whitney and  
representatives of PCC  
Airfoils, LLC.

---

**Inspection Date:**  
December 10, 2013

**Facility Name and ID Number:**  
PCC Airfoils, LLC – Ceramics Group  
OHD004179511

---

1. B. Whitney to PCC – 12/19/13
  2. PCC to B. Whitney – 1/8/14  
with attachments
  3. B. Whitney to PCC – 1/13/14  
and PCC response – 1/15/14
  4. B. Whitney to PCC – 1/24/14
  5. PCC to B. Whitney – 1/27/14  
with attachments
-



## Whitney, Brenda

---

**From:** Whitney, Brenda  
**Sent:** Thursday, December 19, 2013 2:12 PM  
**To:** paul.wilson@pccairfoils.com  
**Subject:** Re: U.S. EPA RCRA Inspection - December 10, 2013

Hi Paul,

Thank you for accompanying me on the inspection at PCC Airfoils in Cleveland last week. I wanted to follow up with you on the matter of the distillation process at that site and how it relates to your management of hazardous waste. Although I said during the inspection that I would contact Pete Stokes of Chemtron on this matter, I would prefer if you could provide me with the information directly so that we do not lose anything in translation.

Please explain why you believe that the material that is to be distilled at PCC does not need to be managed as a hazardous waste prior to treatment. Also, if you would, identify which wastes are being processed through the unit.

If you could cite to a regulation, procedural document, guidance memo, or other written information regarding this process, I would appreciate it.

Thank you for your time,

Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)





## Whitney, Brenda

---

**From:** Hadzinsky, David [David.Hadzinsky@PCCAIRFOILS.COM]  
**Sent:** Wednesday, January 08, 2014 2:41 PM  
**To:** Whitney, Brenda  
**Cc:** Wilson, Paul; Eldridge, Thomas; Dukes, Angela; Leszynski, Jeffery; O'Neill, John  
**Subject:** Recycling activities at PCC Airfoils facility in Cleveland, OH

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Brenda,

Paul Wilson forwarded your email so that I may respond. Attached is the explanation of our activities and practices.

Regards,

Dave

David M. Hadzinsky  
Director, EHS  
PCC Airfoils, LLC  
25201 Chagrin Blvd.  
Suite 290  
Beachwood, Ohio 44122  
(216) 766-6232 office  
(216) 299-6644 mobile  
[david.hadzinsky@pccairfoils.com](mailto:david.hadzinsky@pccairfoils.com)

---

*This email and any attachments may contain confidential and proprietary information and must be treated as such. In addition, export or re-export of the information contained in or attached to this email may be prohibited under export control laws.*



**PCC** Airfoils, LLC  
25201 Chagrin Blvd.  
Suite 290  
Beachwood, OH 44122

January 8, 2014

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604

Re: Recycling activities at the PCC Airfoils facility in Cleveland, OH

Dear Ms. Whitney,

Mr. Wilson forwarded your inquiry to me. Thank you for getting back to us with your question. As you know, we collect our blue dye containing ethanol or hydrolyzed ethyl silicate (ethanol and silica) and process it through our on-site distillation unit to recover clean ethanol. The drums of dye awaiting reclamation are stored in a secure area prior to being processed, but we have historically not managed those drums as hazardous waste based on their still being usable product up until the time that we choose to route them to the distillation unit. Once the dye is deemed waste, the drums are immediately introduced into the still. Although we believe that this practice is appropriate based on the point of generation being the point where we deem a drum to be waste, we decided to change our practice based upon your inquiry. Our new policy is that as soon as dye or ethyl silicate that would fail for ignitability if disposed of is collected in a drum, we will label it as D001 hazardous waste, date it and otherwise manage it as hazardous waste pending introduction into the distillation unit. If that dye is returned to service without reclamation, we will remove the label and return the dye to the process. If that dye is to be distilled, we will do so within 90 days of it being placed in the drum (which is consistent with our historic practice). At the point that the dye is introduced into the still, we will cease managing the dye as hazardous waste. The same management method will be employed with the ethyl silicate.

For waste counting purposes, we will count the dye and ethyl silicate destined for the still that would be considered hazardous if disposed of. For purposes of determining our generator status, we will not double count the solvent recovered from the still and returned to the process.

I should note that if dye were disposed of rather than distilled, the contents would be a characteristic D001 waste and not a listed waste and not hazardous for any other characteristic. That is the reason for our exclusive focus on the D001 classification. If the dye constituents were to change in the future, we would reassess our characterization and labeling.

We believe that the new approach is conservative and addresses fully your concerns. Please let me know if you have any other questions or have any comments on our new procedures.

Sincerely,



David M. Hadzinsky  
Director, EHS  
[david.hadzinsky@pccairfoils.com](mailto:david.hadzinsky@pccairfoils.com)

cc: Mr. Paul Wilson; Mr. Thomas Eldridge; Ms. Angela Dukes-Thompson; Mr. Jeff Leszynski;  
Mr. John O'Neill



## **Whitney, Brenda**

---

**From:** Hadzinsky, David [David.Hadzinsky@PCCAIRFOILS.COM]  
**Sent:** Wednesday, January 15, 2014 4:06 PM  
**To:** Whitney, Brenda  
**Subject:** RE: Recycling activities at PCC Airfoils facility in Cleveland, OH

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Brenda,

1. I estimate that the Cleveland facility will remain a Large Quantity Generator.
2. The Ceramics facility will closely track inventory, purchases, and amount used. If a drum of recycled material is placed into service it will be noted, the same is true for virgin material.
3. When I state that they have historically not been managed as hazardous waste, I refer to the labelling. The drums are in a secure (locked) fenced area and await distillation. Typically drums are distilled if placed into the secure area.
  - a. It is difficult to estimate the percentage of dye that could be reused before it is distilled as that is not our preferred way of managing the material and we do not assess the dye in this manner except in the unusual circumstance where we face an inventory shortage and dye must be reused.
  - b. If the plant were to need the material in the drum in the event of an inventory shortage, the dye would be placed back into service until new supplies were obtained. There is no SOP for making this determination, but the dye would be placed back into service without reclamation.

Kind regards,

Dave

David M. Hadzinsky  
Director, EHS  
PCC Airfoils, LLC  
25201 Chagrin Blvd.  
Suite 290  
Beachwood, Ohio 44122  
(216) 766-6232 office  
(216) 299-6644 mobile  
[david.hadzinsky@pccairfoils.com](mailto:david.hadzinsky@pccairfoils.com)

---

**From:** Whitney, Brenda [<mailto:whitney.brenda@epa.gov>]  
**Sent:** Monday, January 13, 2014 2:24 PM  
**To:** Hadzinsky, David  
**Subject:** RE: Recycling activities at PCC Airfoils facility in Cleveland, OH

Hello David,

Thank you for your letter. I will put it in the file straight away.

I have a few questions and requests, based on the information you provided me in the letter.

1. Assuming a fairly constant rate of waste generation, what do you estimate to be the generator status of the Cleveland facility given the new procedures you outlined in your letter?
2. Do you intend to use an inventory method for counting newly generated wastes? If you keep track of how much raw material is used up in a month, it might be a good indication of how much new waste is being generated and may help to alleviate double counting.
3. You stated the following: "The drums of dye awaiting reclamation are stored in a secure area prior to being processed, but we have historically not managed those drums as hazardous waste based on their still being usable product up until the time that we choose to route them to the distillation unit."
  - a. Please provide an estimation of what percentage of this material may be reused before it is distilled.
  - b. Please provide, if available, a protocol or standard operating procedure that explains how it is determined whether or not the used material meets specifications for reuse prior to distillation.

Thanks again,  
Brenda

-----  
Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)

---

**From:** Hadzinsky, David [<mailto:David.Hadzinsky@PCCAIRFOILS.COM>]  
**Sent:** Wednesday, January 08, 2014 2:41 PM  
**To:** Whitney, Brenda  
**Cc:** Wilson, Paul; Eldridge, Thomas; Dukes, Angela; Leszynski, Jeffery; O'Neill, John  
**Subject:** Recycling activities at PCC Airfoils facility in Cleveland, OH

Brenda,

Paul Wilson forwarded your email so that I may respond. Attached is the explanation of our activities and practices.

Regards,

Dave

David M. Hadzinsky  
Director, EHS  
PCC Airfoils, LLC  
25201 Chagrin Blvd.  
Suite 290  
Beachwood, Ohio 44122  
(216) 766-6232 office  
(216) 299-6644 mobile  
[david.hadzinsky@pccairfoils.com](mailto:david.hadzinsky@pccairfoils.com)

## Whitney, Brenda

---

**From:** Whitney, Brenda  
**Sent:** Friday, January 24, 2014 4:10 PM  
**To:** Wilson, Paul  
**Subject:** RE: Re: U.S. EPA RCRA Inspection - December 10, 2013

Hi Paul,

Is it possible to email me the RCRA contingency plan for the Cleveland facility?  
Also, do you have RCRA-based training records (three years worth) for the emergency coordinators, folks who sign manifests, and other employees whose job descriptions include hazardous waste management? If so, please forward those to me as well.

I'll let you know if I need to see anything else.

Thanks!

Brenda Whitney

---

**From:** Wilson, Paul [<mailto:Paul.Wilson@PCCAIRFOILS.COM>]  
**Sent:** Friday, January 03, 2014 8:06 AM  
**To:** Whitney, Brenda  
**Subject:** RE: Re: U.S. EPA RCRA Inspection - December 10, 2013

Happy New Year to you. I will be back in the office on Monday. I should have everything we need. Have a good week end  
Thanks Paul

---

**From:** Whitney, Brenda [<mailto:whitney.brenda@epa.gov>]  
**Sent:** Thursday, January 02, 2014 3:20 PM  
**To:** Wilson, Paul  
**Subject:** FW: Re: U.S. EPA RCRA Inspection - December 10, 2013

Happy New Year, Paul,

I was wondering if you've had a moment to look into my email below?

Thanks,  
Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)

---

**From:** Whitney, Brenda  
**Sent:** Thursday, December 19, 2013 2:13 PM





## Whitney, Brenda

---

**From:** Wilson, Paul [Paul.Wilson@PCCAIRFOILS.COM]  
**Sent:** Monday, January 27, 2014 12:38 PM  
**To:** Whitney, Brenda  
**Subject:** RE: Re: U.S. EPA RCRA Inspection - December 10, 2013  
**Attachments:** Cleveland Contingency and Emergency Response Plan 012014; RE: RCRA Certs for 2011 2012 2013

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hope this works. Thanks Paul

---

**From:** Whitney, Brenda [mailto:whitney.brenda@epa.gov]  
**Sent:** Friday, January 24, 2014 5:10 PM  
**To:** Wilson, Paul  
**Subject:** RE: Re: U.S. EPA RCRA Inspection - December 10, 2013

Hi Paul,

Is it possible to email me the RCRA contingency plan for the Cleveland facility?  
Also, do you have RCRA-based training records (three years worth) for the emergency coordinators, folks who sign manifests, and other employees whose job descriptions include hazardous waste management? If so, please forward those to me as well.

I'll let you know if I need to see anything else.

Thanks!

Brenda Whitney

---

**From:** Wilson, Paul [mailto:Paul.Wilson@PCCAIRFOILS.COM]  
**Sent:** Friday, January 03, 2014 8:06 AM  
**To:** Whitney, Brenda  
**Subject:** RE: Re: U.S. EPA RCRA Inspection - December 10, 2013

Happy New Year to you. I will be back in the office on Monday. I should have everything we need. Have a good week end  
Thanks Paul

---

**From:** Whitney, Brenda [mailto:whitney.brenda@epa.gov]  
**Sent:** Thursday, January 02, 2014 3:20 PM  
**To:** Wilson, Paul  
**Subject:** FW: Re: U.S. EPA RCRA Inspection - December 10, 2013

Happy New Year, Paul,

I was wondering if you've had a moment to look into my email below?

Thanks,  
Brenda

---

Brenda Whitney





Airfoils, LLC  
Ceramics Group

Cleveland Plant - Sherwood Refractories  
1781 Octavia Road  
Cleveland, Ohio 44112  
(440) 944-1880

rev. January 1, 2014

# Contingency and Emergency Response Plan

<u>CONTENTS</u>	<u>PAGE</u>
<b>SECTION:</b>	
Emergency Telephone Numbers	2
1.0 Introduction	3
2.0 Distribution and Amendment of the Contingency Plan	3
3.0 Emergency Coordinator	3
3.1 Qualifications	3
3.2 Alternate Emergency Coordinator	4
3.3 Responsibilities	5
4.0 Emergency Response Procedures	6
4.1 Communications	6
4.2 Evacuation Plan	7
4.3 Emergency Equipment	8
4.4 Fire	8
4.5 Explosion	9
4.6 Spill or Release of Hazardous Materials	9
4.7 Disposition of Waste Materials	9
5.0 Notification Requirements	10
Appendix A. Emergency Equipment	11
Appendix B. Evacuation Routes	12

**EMERGENCY TELEPHONE NUMBERS**

City of Cleveland Fire Department	(216) 621-1212 or 911
City of Cleveland Police Department	(216) 621-1234 or 911
Emergency Medical Care	911
Emergency Coordinator – Paul Wilson (440) 343-2017 (Cell) (440) 951-1324 (Home)	(440) 944-1880 Ext 143 (Work)
Emergency Coordinator - Alternate 1 - Jeffery Leszynski (440) 285-2703 (Home)	(440) 944-1880 Ext 328 (Work) (440) 525-3285 (Cell)
National Response Center	1-800-424-8802
Ohio Environmental Protection Agency	(330) 963-1200
Plant Wide PA System (paging system)	7948
EPA Emergency Response Team	1-800-282-9378

## **EMERGENCY RESPONSE PLAN**

### **1.0 INTRODUCTION**

To provide an emergency action plan to serve as a guide to protect personnel from injury; minimize damage to Company property; and assist in case of an emergency.

### **2.0 DISTRIBUTION AND AMENDMENT OF THE CONTINGENCY PLAN**

All emergency response team members; security personnel; PCC corporate officers; local hospitals; local police and fire department shall be designated for distribution of PCC Airfoils, Inc., /Sherwood Refractories Emergency Response Plan.

This Plan will be amended whenever:

- Applicable regulations are revised.
- Post-emergency analysis identifies necessary changes
- The facility changes its design, construction, operation, maintenance, or other circumstances in a way the materially increases the potential for fires, explosions or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.
- The list of emergency coordinators or their phone numbers change.
- The list of emergency equipment change.

Whenever this plan is amended, all old copies will be collected and replaced with copies of the amended plan.

### **3.0 EMERGENCY COORDINATOR**

#### **3.1 Qualifications**

The designated on-site emergency coordinator (EC) will be available at all times to take responsibility for coordination of all emergency response measures. The EC is thoroughly familiar with all aspects of this contingency plan, and has the authority to commit to resources needed to carry out the plan. The EC is thoroughly acquainted with all the facility operations and activities, the location and characteristics of the raw materials and waste handled; the location of all records within the facility, and the location of emergency equipment.

The designated principal emergency coordinator is:





Paul Wilson, Maintenance Supervisor  
(440) 944-1880 Ext 143 (Work)  
(440) 343-2017 (Cell)  
(440) 951-1324 (Home)  
Home Address:  
959 Becker Court  
Eastlake, OH 44095

### 3.2 Alternate Emergency Coordinators

In the event that the principal EC is unavailable to direct emergency response actions, alternate emergency coordinators (alternate EC's) have been appointed. The alternate EC's for our facility is:

Jeffery Leszynski, Cleveland Plant Manager  
(440) 944-1880 ext. 328 (Work)  
(440) 525-3285 (Cell)  
(440) 285-2703 (Home)  
Home Address:  
11335 Beechnut Lane  
Chardon, Ohio 44024

In addition to the EC and alternate EC's, the designated shift coordinators will be each shift's Foreperson and Security personnel, who should be contacted at (440) 944-1880 in the event that the EC and the alternate EC's are unavailable.

The onsite alternate emergency coordinator for 2<sup>nd</sup> Shift is:

Dion Bowles, 2<sup>nd</sup> Shift Lead Person  
(440) 944-1880 (Work)  
(216) 374-8643 (Cell)  
Home Address:  
20701 Nicholas Avenue  
Euclid, Ohio 44123

The onsite alternate emergency coordinator for 3<sup>rd</sup> Shift is:

Harold Griffin  
13514 Blen Hiem  
Cleveland, Ohio 44110  
Home phone: (216) 324-4961  
Cell: (440) 527-1324

### 3.3 Responsibilities

The emergency coordinator is responsible for initiating and directing emergency response actions. A list of general responsibilities from 40 CFR 265.56 is reprinted below:

#### § 265.56 Emergency Procedures

- (A) Whenever there is an emergency situation consisting of imminent or actual harm or hazard to human health or the environment, the emergency coordinator (or his designee when the emergency coordinator is on call) shall immediately:
  - (1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
  - (2) Notify Ohio EPA emergency response team by use of its twenty-four hour toll free telephone number 1-800-282-9378.
- (B) Whenever there is a release, fire, or explosion, the emergency coordinator shall immediately identify the character, exact source, amount, and area extent of any released materials. The emergency coordinator may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.
- (C) The emergency coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion, and shall include, but not be limited to, the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions.
- (D) If the emergency coordinator determines that the facility has had a release, fire, or explosion, which could threaten human health, or the environment, outside the facility, he shall report his findings as follows:
  - (1) If his assessment indicates that evacuation of local areas may be advisable, he shall immediately notify appropriate local authorities. The emergency coordinator shall be available to help appropriate officials decide whether local areas should be evacuated; and
  - (2) The emergency coordinator shall immediately notify Ohio EPA emergency response team by use of its twenty-four hour toll free telephone number 1-800-282-9378 and provide the following information:
    - (a) Name and telephone number of reporter;
    - (b) Name and address of facility;
    - (c) Time and type of incident (e.g., release, fire);
    - (d) Name and quantity of material(s) involved, to the extent known;
    - (e) The extent of injuries, if any; and
    - (f) The possible hazards to human health, or the environment outside the facility.



- (E) During an emergency, the emergency coordinator shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
- (F) If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- (G) Immediately after an emergency, the emergency coordinator shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
- (H) The emergency coordinator shall ensure that, in the affected area(s) of the facility:
  - (1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
  - (2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
- (I) The owner or operator shall notify the director and appropriate local authorities that the facility is in compliance with paragraph (H) of this rule before operations are resumed in the affected area(s) of the facility.
- (J) The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within fifteen days after the incident, the owner or operator shall submit a written report on the incident to the director. The report shall include:
  - (1) Name, address, and telephone number of the owner or operator;
  - (2) Name, address, and telephone number of the facility;
  - (3) Date, time, and type of incident (e.g., fire, explosion);
  - (4) Name and quantity of material(s) involved;
  - (5) The extent of injuries, if any;
  - (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable;
  - (7) Estimated quantity and disposition of recovered material that resulted from the incident; and
  - (8) Any other information as the director may require.

## SECTION 4.0

## EMERGENCY RESPONSE PROCEDURES

### 4.1 Communications

An employee observing a potential emergency situation should immediately contact his/her departmental Foreperson/Leadperson and provide the location and description of the incident. The Foreperson/Leadperson will then supply the EC with the

information. If the EC cannot be located, the alternate EC should be contacted immediately. In the event that the employee who observed the emergency condition cannot immediately locate the Foreperson/Leadperson, the EC, or the alternate EC, the employee should contact Security. If applicable, Security will dial 911 and describe the nature and location of the emergency.

The EC will use the telephone page system (7948) and fire alarm system to notify employees of the emergency. The EC will evaluate the nature, extent and location of the fire/explosion/release to determine whether partial or total evacuation is required (as in their department(s) as to the appropriate evacuation route as posted in each department). The EC will also contact local authorities (police, fire, ambulance) as required. If the emergency involves a spill or release, or a threatened spill or release of a reportable quantity, the EC will immediately report the incident to the Environmental Protection Agency (EPA) Spill Hotline at (800) 282-9378 and to the National Response Center (NRC) 800-424-8802.

#### 4.2 Evacuation Plan

The evacuation plan for this facility includes the telephone page and fire alarm systems for alerting employees to an emergency situation, the routes by which the employee will evacuate their work areas and the method of accounting for employees outside the building.

The warning system in the facility is composed of the telephone page and fire alarm systems. The EC will activate this system by calling the individual departments in the case of limited evacuation. In the event a department cannot be reached by telephone/page, a general evacuation will be implemented by fire alarm. This will avoid a dangerous delay in alerting employees who might be in danger. The EC will issue the "all clear" when the emergency situation is under control and it is safe for employees to re-enter the work place.

Appendix B is a map of the facility, which shows the exits and the evacuation routes to be used in case of an emergency. Copies of the evacuation routes are posted in the facility, and all employees are to be acquainted without the evacuation routes from their work areas.

Once an evacuation is underway, it is imperative that all employees be accounted for. Once outside the building, the department supervisor will account for each employee in his/her department, as well as any visitors in the area at the time of the evacuation. The EC will designate an employee to compile the information from each supervisor. The name and presumed location of anyone remaining in the building should be given to the EC and emergency authorities (fire, police, etc.) immediately.

#### 4.3 Emergency Equipment

Appendix A. also shows the type and location of safety and emergency equipment available during an emergency. The EC and Maintenance are responsible for inventory and maintenance of this equipment. Any materials expended during an emergency must be replaced. It is the EC's responsibility to see that all equipment is cleaned and returned to working order before operations in affected areas of the facility resume.

#### 4.4 Fire

If a fire is observed that does not pose an immediate threat to human health, the EC will assess the extent of the fire and if the fire can be controlled without endangering human health. Flammable materials and hazardous substances will be moved away. The EC will also consider the probable path of the fire, and the location of the major evacuation routes. If the fire could potentially spread and threaten evacuation routes, an immediate evacuation will be ordered. Flammable materials and hazardous substances will be moved away from the fire. Fire extinguishers will only be used if the fire poses no unreasonable risk to human health.

If a fire is observed which does pose an immediate threat to human health (potential toxic, irritating or asphyxiating gases being generated), a plant-wide evacuation is required. The observing employee will summon the fire department by using the emergency fire pulls, or by dialing 911. Immediately after the fire department has been summoned, the EC will appoint an employee to stand at the corner of Octavia and Euclid Avenue to meet the fire department and direct them to the approximate area of the fire. Upon arrival, the fire department will be informed of any hazardous materials burning or located near the fire. They will also be informed of any employee(s) unaccounted for.

The automatic sprinkler system will be activated in the event of a fire. Security and maintenance personnel are to check the affected sprinkler control valves to ensure that sprinkler protection is in full service and that the valves are not inadvertently or prematurely closed in the event of a fire.

The EC will assess the risk of contaminated water from the fire fighting becoming runoff and contaminating soil around the facility. If this potential exists, the EC will work with the fire department to contain the runoff.

After the fire has been extinguished and fire department determines that it is safe to enter the building, the EC will inspect the building to be sure that no spills or releases of hazardous materials have occurred, and that none are threatened. If a spill or release has occurred or is threatened, the EC will follow the procedures outlined in Section 4.6.

#### **4.5 Explosion(s)**

In the event an explosion occurs at the facility, the evacuation procedure, Section 4.2, is to be followed. If a fire occurs, the procedures in Section 4.4 will also apply. If any injuries have occurred, EMS and local hospitals will be contacted immediately by the EC or Security. After a determination has been made that the building is safe to enter, the EC will assess the cause of the explosion and whether any hazardous material releases have or could occur.

#### **4.6 Spill or Release of Hazardous Materials**

In the event of a spill or release of a hazardous material, or the threatened release of a hazardous material, the EC will immediately determine the source, extent and nature of the release and the presence of any imminent danger to human health or safety. If necessary, local emergency authorities will be called in [fire and/or police department(s)].

The first action taken by the EC will be to determine the source of the spill or release. If the spill or leak is active, the EC will take action to stop the leak. If appropriate, pumps and valves in the area will be shut off. Caution must be exercised to prevent pressures from building up in the lines as a result of closing valves.

A liquid spill should be contained using absorbent materials. The liquid should be prevented from entering storm sewers or leaving the property. Free-standing liquids will be pumped into DOT-approved containers. If a liquid hazardous material leaks or is spilled onto a previous surface (such as soil) the spill should be prevented from spreading by building berms or digging trenches, and visibly contaminated soil should be excavated and placed in DOT-approved containers.

Spill Control Procedures are also contained in the MSDS for each material. MSDSs are located in the main hallway by the cafeteria.

Care must be exercised to prevent worker exposure to hazardous materials when dealing with a spill or leak. Workers must be properly outfitted in appropriate personnel protection equipment before entering a spill area. These procedures are covered in the Spill Prevention Control Plan for the facility.

#### **4.7 Disposition of Waste Materials**

Following an emergency, the EC will implement cleanup procedures which will recover waste materials generated during the emergency situation. These materials would include any liquids or solids recovered from a spill or release; soil contaminated by the spill or by water from fire fighting operations; residues from ruptured drums, pipelines



or containers; and any other material contaminated during the emergency. Unless it can be demonstrated that the recovered material is not hazardous waste, the material will be assumed to be hazardous and will be managed in accordance with RCRA regulations.

## **SECTION 5.0 NOTIFICATION REQUIREMENTS**

If the EC determines that the facility has had a release, fire, or explosion which could threaten human health or the environment outside of the facility, or has had a release or a reportable quantity of hazardous material, the National Response Center (800-424-8802) or the Ohio EPA (Twinsburg 330-425-9791/Emergency Response 800-282-9378) will be notified immediately.

The EC will provide the name and address of the facility, the time of the incident, a description of the incident, the extent of injuries, and the potential hazard to human health or the injuries, and the potential hazard to human health or the environment outside the facility. If the material is released into the sewer, the Northeast Ohio Regional Sewer District is contacted.

After the emergency situation has been controlled, the facility will notify the above of the status of cleanup operations, the storage and disposal of incompatible waste materials, and the replacement or repair of emergency response equipment.

The facility will also submit information regarding the emergency to the U.S. EPA Regional Administrator within 15 days of the emergency. The required information includes:

1. Names; address and telephone number of PCC Airfoils, LLC, Ceramics Group, Sherwood Refractories, Inc., 1781 Octavia Road, Cleveland, Ohio 44112, 440-944-1880.
2. Date, time and type of incident.
3. Type and quantity of materials involved.
4. Extent of injuries sustained.
5. An assessment of actual or potential hazards to human health or the environment.
6. Estimated quantity and disposition of recovered material that resulted from the incident.



**Appendix A                      Emergency Response Equipment**

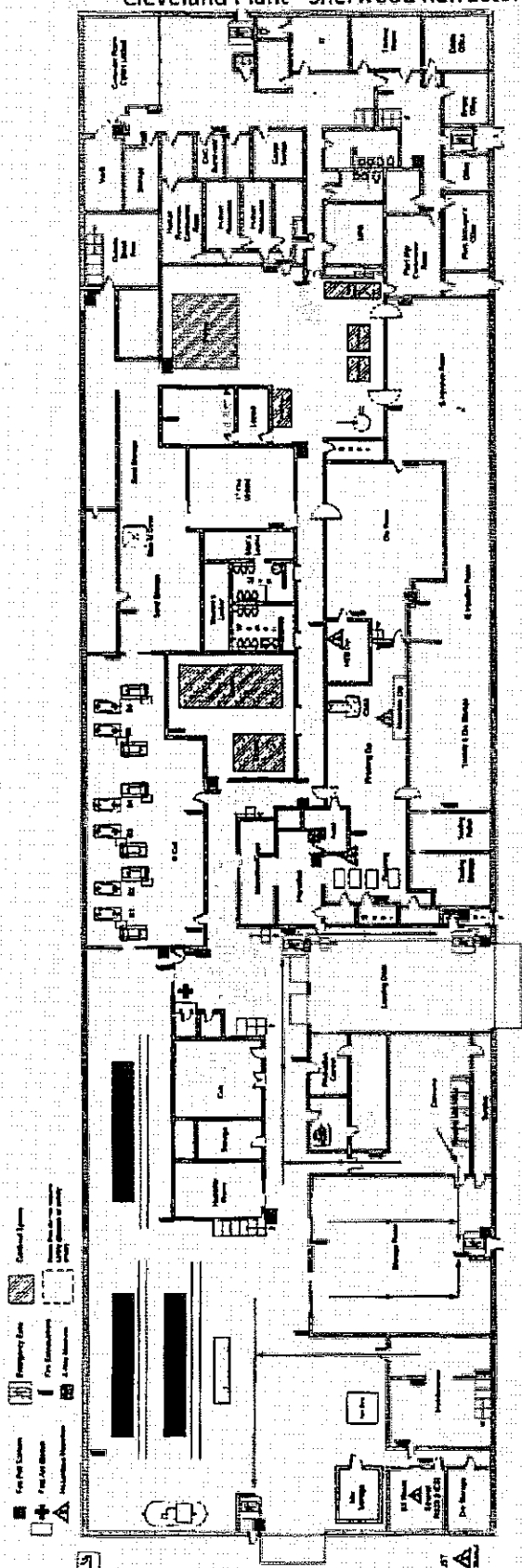
<b>Equipment Description</b>	<b>Capabilities</b>	<b>Location</b>
Paging System	Notify employees of hazards and or evacuation.	Accessed from any plant phone located throughout the facility.
Fire Alarm System	Notify employees of evacuation and notify local fire department.	Pull boxes and alarms located throughout the facility.
Fire Extinguishers	Extinguish small fires	50# BC North Dock (SRI 49) 50# BC Block room (SRI 66) 20# BC Outside SIL room (SRI 5) 28# ABC LPS room (SRI 13) 15# BC Dip room (SRI 30)
Spill Response Drums containing absorbent pads, and absorbent SOCs.	Containment and cleanup of hazardous material spills.	North dock area Main dock area HES Dip room LPS Room Block room

## **Appendix B                      Evacuation Plan**

The evacuation plan provides guidelines that should be followed in case of an emergency. Four types of emergencies are outlined – Fire, Natural Disaster, Bomb Threat, and Medical Emergency.

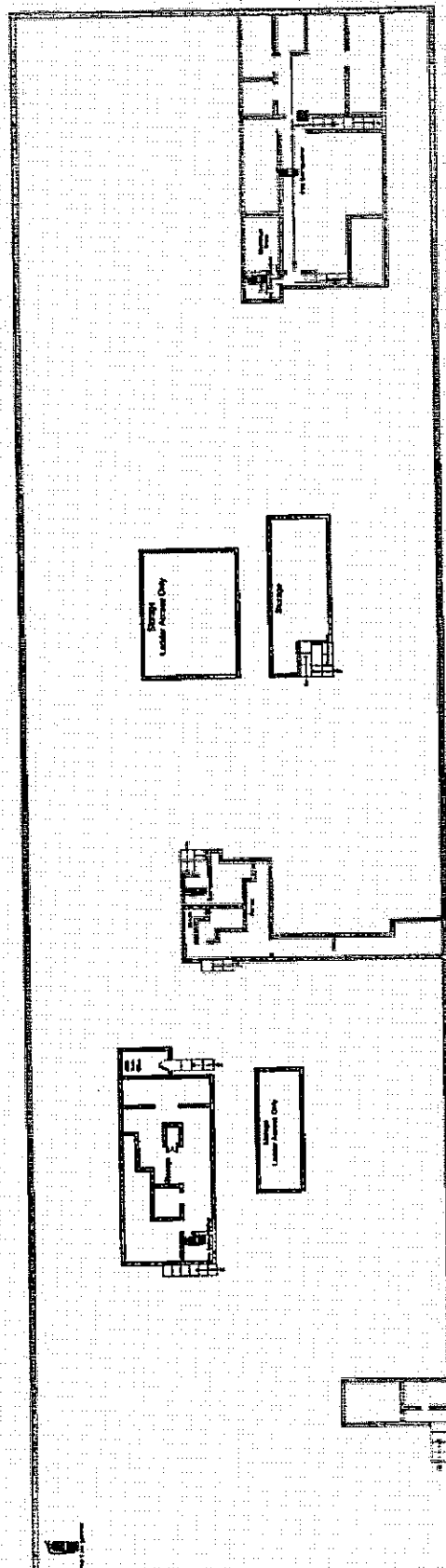
Please familiarize yourself with each plan and the office evaluation layout. It could make a difference.

### Cleveland Plant - Sherwood Refractories



Page 13

rev. January 1, 2014



**FIRE**

The attached map provides highlighted exits, alarm and extinguisher locations. Listed below are the steps to be followed:

1. Don't panic; notify your Supervisor or Lead that something is wrong.
2. Pull fire alarm as you evacuate the building – Pull switches (alarms) are located throughout the plant and by exits.
3. Never fight a fire alone. If you use a fire extinguisher, make sure you have help when extinguishing a fire. Only attempt to use an extinguisher for an isolated fire where the structure, or building, is not on fire.
4. Never let a fire get between you and an exit.
5. If a fire is located in an area which can be enclosed, shut the door on the fire, ensuring no injury to you. This will slow down the spread of a fire.
6. If smoke is in the suite, stay close to the floor. Smoke rises and there is approximately 18" from the floor of clean air.
7. Keep lights on. This allows Fire Fighters to see when entering the building.
8. Use exit nearest your location. Move quickly out of the building and proceed to the evacuation area designated for your department. Stay out of the fire lanes. Do not re-enter until instructed to do so. Your Supervisor or Lead will be your point of contact. Do not approach Paul Wilson, Maintenance Supervisor or Chuck Mulanax, HR Rep. They are the Emergency Response Coordinators and have specific tasks they must complete.

All Areas	Gather in the parking lot by the loading dock.
-----------	--

**Do's**

1. Know your primary and alternate evacuation routes.
2. Get down low and crawl if caught in heavy smoke.
3. Keep calm.
4. Close all doors as you leave if in an office or conference room.
5. Evacuate to your designated location and await further instructions.
6. Hold on to handrails when using stairs.
7. Be ready to merge with other people exiting the building.
8. Follow instructions from your Supervisor or Emergency Personnel.

**Don'ts**

1. DO NOT attempt to fight a fire unless it is isolated.
2. DO NOT smoke.
3. DO NOT run in the stairwells.
4. DO NOT return to your department until you are instructed to do so by your Supervisor or Manager.

**NATURAL DISASTER**

In the event of a natural disaster, the following steps should be taken:

**TORNADO** – In the event of an impending tornado, proceed according to the table below:

All Areas	Gather in the parking lot by the loading dock.
-----------	--

**EARTHQUAKE** – At the first sign of danger, evacuate the building. Move away from the building to an open area. Watch for broken glass, trees, or any flying debris. In the event you can't leave the building, stand in doorways, stairwells, or get under a desk. Cover your face and head. Once the disaster is over, proceed cautiously out of the building and go to your designated location.

**BOMB THREAT** – Follow these steps in the event of a bomb threat:

Whoever takes the call should:

1. Try to keep the person on the line; do not upset the individual.
2. While on the phone, get someone's attention so they can call 9-911.
3. Form an impression of the caller, take notes. Did the person have an accent, did the person sound nervous? Write down any other distinguishable characteristics of their voice.
4. Where is the bomb located?
5. Tell them about the innocent people who could be hurt by this.
6. Find out how long before the bomb goes off. If there is time, the police will try to locate the bomb, if not, inform everyone to evacuate the building immediately and proceed to your designated locations.
7. Do not disturb anything that is out of place or that looks suspicious. A bomb doesn't have to look like a bomb to be a bomb.
8. Do not use radios, cell phones, or paging systems, this could set off the bomb.

Use the next page as a guide while talking to the person making the bomb threat.

### **BOMB THREAT PROCEDURES**

All bomb threats must be taken seriously. All calls should be regarded as having a HIGH DEGREE OF URGENCY!

If you receive a telephone bomb threat:

✎ Write down the exact words of the caller's message.

✎ Ask the following questions in order to provide additional information to the police:



When will it go off?	
Where is it located?	
What type of bomb is it?	
Why are you doing this?	
Who are you?	

✎ Fill out the following:

Time of day:	
Exact words of the caller.	
Male or Female?	
Does the call have an accent?	
Is the caller nervous?	
What is their speech like?	
Is the voice familiar?	
Is the call intoxicated?	
Any background noises?	
Time call terminated:	

**\*\*\*DO NOT HANG UP** so the line will be open in the event the call can be traced.

**DO NOT TOUCH ANY SUSPICIOUS OBJECTS**

Do not discuss a bomb threat with anyone other than security, police or your Supervisor.



Immediately, if possible, "wave down" your neighbor to help alert your Supervisor. Then as soon as possible call 9-911.

**MEDICAL EMERGENCY** – In case of a medical emergency do the following:

1. Dial 9-911. Assist the operator any way that you can.
2. Wave someone down to notify the Supervisor.
3. Unless absolutely necessary, **DO NOT** move the victim.
4. Keep the area clear and try to calm the victim.
5. Someone should go to the parking lot by Octavia Street to direct paramedics.

Human Resources should be notified immediately. They will be responsible for any personal items if transportation is necessary.



# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

*Paul Wilson*

**Has successfully completed the training course entitled  
DOT REFRESHER TRAINING, including:  
Transportation Security Awareness Training**

*HM 181/126F per 49 C.F.R. §§172.700-172.704*

**And is hereby awarded this Certificate of Completion  
This 22nd day of July, 2011**

  
**James D. Erclauz  
Instructor**

**CHEMTRON CORPORATION  
ENVIRONMENTAL SERVICES**

hereby certifies that

*Paul Wilson*

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion  
This 22nd day of July, 2011**

  
**James D. Erclauz  
Instructor**

# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

**hereby certifies that**

***Dan Wheeldon***

**Has successfully completed the training course entitled  
DOT REFRESHER TRAINING, including:  
Transportation Security Awareness Training**

***HM 181/126F per 49 C.F.R. §§172.700-172.704***

**And is hereby awarded this Certificate of Completion  
This 22nd day of July, 2011**

  
**James D. Erclauz  
Instructor**

# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

***Dan Wheeldon***

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion  
This 22nd day of July, 2011**

  
**James D. Erclauz**  
**Instructor**

# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

**hereby certifies that**

***Ronald Wenderoth***

**Has successfully completed the training course entitled  
DOT REFRESHER TRAINING, including:  
Transportation Security Awareness Training**

***HM 181/126F per 49 C.F.R. §§172.700-172.704***

**And is hereby awarded this Certificate of Completion  
This 22nd day of July, 2011**

  
**James D. Erclauz  
Instructor**

**CHEMTRON CORPORATION  
ENVIRONMENTAL SERVICES**

hereby certifies that

*Ronald Wenderoth*

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion**

**This 22nd day of July, 2011**

  
**James D. Erclauz  
Instructor**



# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

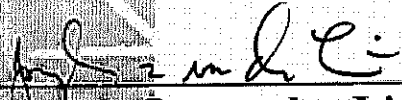
hereby certifies that

*Paul Wilson*

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion  
This 7<sup>th</sup> day of December, 2012**

  
**Joseph Q. von der Lieth**  
**Instructor**

# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

*Dan Wheeldon*

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion  
This 7<sup>th</sup> day of December, 2012**

  
**Joseph Q. von der Lieth**  
**Instructor**

# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

**hereby certifies that**

***Ron Wenderoth***

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion**

**This 7<sup>th</sup> day of December, 2012**

  
**Joseph Q. von der Lieth**  
**Instructor**





# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

*Paul Wilson*

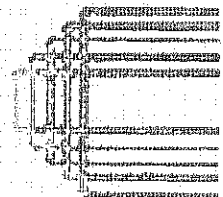
**Has successfully completed the training course entitled  
DOT REFRESHER TRAINING, including:**

***HM 181/26F per 49 C.F.R. §§172.700-172.704***

**And is hereby awarded this Certificate of Completion  
This 24<sup>th</sup> day of September, 2013**



**Joseph Q. von der Lieth  
Instructor**





# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

*Paul Wilson*

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

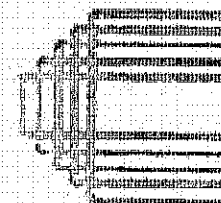
**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion**

**This 24<sup>th</sup> day of September, 2013**



**Joseph Q. von der Lieth  
Instructor**







# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

***Dan Wheeldon***

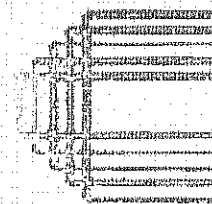
**Has successfully completed the training course entitled  
DOT REFRESHER TRAINING, including:**

***HM 181/126F per 49 C.F.R. §§172.700-172.704***

**And is hereby awarded this Certificate of Completion  
This 24<sup>th</sup> day of September, 2013**



**Joseph Q. von der Lieth  
Instructor**



# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

***Dan Wheeldon***

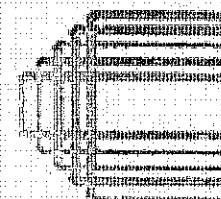
**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion**

**This 24<sup>th</sup> day of September, 2013**

  
**Joseph Q. von der Lieth**  
**Instructor**







# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

***Ron Wenderoth***

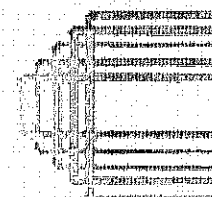
**Has successfully completed the training course entitled  
DOT REFRESHER TRAINING, including:**

***HM 181/126F per 49 C.F.R. §§172.700-172.704***

**And is hereby awarded this Certificate of Completion  
This 24<sup>th</sup> day of September, 2013**



**Joseph Q. von der Lieth  
Instructor**





# **CHEMTRON CORPORATION ENVIRONMENTAL SERVICES**

hereby certifies that

*Ron Wenderoth*

**Has successfully completed the training course entitled  
Annual RCRA Hazardous Waste Management Training**

**This class was designed to satisfy the annual training  
requirement for persons subject to Hazardous Waste  
Management regulations. [Ref. 40 CFR 262.34(a)(4) and  
265.16 or 40 CFR 262.34(d)(5)(iii)]**

**And is hereby awarded this Certificate of Completion**

**This 24<sup>th</sup> day of September, 2013**

  
**Joseph Q. von der Lieth  
Instructor**

